VIA Electronic Submission

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Ex Parte
In The Matter of Allocations and Service Rules for the 71-76GHz, 81-86GHz bands; WT Docket Number 02-146
Point to Multipoint Use and General Comments

Dear Ms. Dortch:

W-Band Communications Corp (WBCC) believes that communications equipment deployments in Point to Point and "hub and spoke" link configurations as discussed in the proposed rulemaking and comments are well represented and of critical commercial importance.

WBCC also strongly believes that Point to Multipoint (PMP) holds the promise of even better commercial economics as the cost of a single Hub Terminal transceiver and antenna in a PMP system is shared by many Subscriber Terminals. PMP operation will further improve the rate of commercial adoption and improve efficiency of the proposed spectrum and rooftop/tower space.

PMP cooperates well with the proposed spectrum and has been demonstrated as technically feasible for last mile applications. PMP is particularly useful for Ethernet campus applications, backhaul applications for next generation mobile wireless services, as well as, 802.11 and 802.16 applications where bandwidth and cost of backhaul is the main bottleneck and a major cause of significantly lower than projected network deployment rates.

WBCC would ask that minimal modifications to the prior proposed rules and comments be made to allow for PMP configurations in addition to Point to Point.

PMP Hub Terminal, Part 101.115(c) Minimum Antenna Gain - WBCC would propose that Minimum Antenna Gain for a Hub Terminal in a PMP be 15 dBi or greater to include Half Power elliptical Sector beam widths; i.e. 90x15, 60x30, 45x20 degrees, etc.

PMP Subscriber Terminal – in order to limit potential interference in a PMP system and allow for the harmonious operation of both Point to Point and PMP in a given area, WBCC agrees with the proposed aspects of Parts 101 as they relate to the Subscriber Terminal in a PMP configuration. Specifically: 44dBi Minimum Antenna Gain, +55dBw

Maximum EIRP, 5000MHz Max Bandwidth, and no limit on Modulation Spectral Efficiency.

Additionally, WBCC strongly agrees with several aspects of the Joint Reply Comments filed by Cisco, Bridgewave, Ceragon, Endwave, LOEA, Stratex:

1) Dual Band FDD - that a policy be adopted allowing only the use of Dual Band Frequency Division Duplex (FDD) and excluding the use of both Single Band FDD and Time Division Duplex. This will allow the proposed spectrum to reach its full bandwidth/data rate potential while allowing the greatest number of communications links to operate without harmful interference in a given area.
2) No Unlicensed Use - that unlicensed use should not be permitted in the 71-76GHz and 81-86GHz bands. A significant amount of spectrum around 60GHz has already been set aside for Unlicensed applications.

WBCC appreciates your attention to this matter. If you have any questions, we would be pleased to discuss the proposal mentioned above in greater detail or any other element of this proceeding.

Sincerely,

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